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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
PAULO ALFONSO PEREZ-MENDOZA,  
  
Defendant.

CASE NO. 2:24-CR-00073 DC

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
[PROPOSED] FINDINGS AND ORDER

**STIPULATION**

1. By previous order, this matter was set for a status conference before this Court on August 22, 2025.

2. By this stipulation, the parties now move to reset the status conference for December 12, 2025, and to exclude time between August 22, 2025, and December 12, 2025, under Local Code T4. At that time, the parties will set the matter for a change of plea or trial. Should the parties file a plea agreement before that time, the parties may seek to vacate the status conference and set the matter for a change of plea by means of a stipulation and proposed order.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes 21,054 Bates Stamped pages of material, including recordings, cell phone extractions, and photographs. All of this discovery has been either produced directly to counsel and/or made

1 available for inspection and copying.

2 b) The parties have been discussing whether a resolution is possible in this case. On  
3 April 11, 2024, the government communicated a plea offer to the defendant. That offer expired  
4 on February 3, 2025. A new plea offer with different terms was extended on April 8, 2025, with  
5 a deadline of November 1, 2025.

6 c) Although new counsel was added to the case pending the return to work of the  
7 defendant's original attorney, Meghan McLoughlin, Ms. McLoughlin recently indicated that her  
8 client, who is out of custody, prefers to move forward in this case with the assistance of Ms.  
9 McLoughlin. To that end, Ms. McLoughlin would like to communicate the government's April  
10 8, 2025, plea offer to the defendant and review with him the plea agreement, which memorializes  
11 the terms.

12 d) Counsel for defendant believes that failure to grant the above-requested  
13 continuance would deny them the reasonable time necessary for effective preparation, taking into  
14 account the exercise of due diligence.

15 e) The government does not object to the continuance.

16 f) Based on the above-stated findings, the ends of justice served by continuing the  
17 case as requested outweigh the interest of the public and the defendant in a trial within the  
18 original date prescribed by the Speedy Trial Act.

19 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
20 et seq., within which trial must commence, the time period of August 22, 2025 to December 12,  
21 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
22 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
23 of the Court's finding that the ends of justice served by taking such action outweigh the best  
24 interest of the public and the defendant in a speedy trial.

25 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
26 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
27 must commence.

28 ///

1 IT IS SO STIPULATED.

2  
3 Dated: July 15, 2025

MICHELE BECKWITH  
Acting United States Attorney

4  
5 /s/ KAREN A. ESCOBAR  
KAREN A. ESCOBAR  
6 Assistant United States Attorney

7  
8 Dated: July 15, 2025


/s/ Meghan McLoughlin  
Meghan McLoughlin  
9 Counsel for Defendant  
Paulo Alfonso Perez-Mendoza

**ORDER**

The court, having received, read, and considered the parties' stipulation and good cause appearing therefrom, ADOPTS the parties' stipulation in part. Accordingly, the Status Conference scheduled for August 22, 2025, is VACATED and RESET for December 5, 2025 at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins at which time the parties should be prepared to set a change of plea hearing or trial dates. (The parties requested date of December 12, 2025 is no longer available.) The time period between August 22, 2025 and December 5, 2025, inclusive, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4], as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

Dated: July 31, 2025

  
Dena Coggins  
United States District Judge